

SUMMARY

The Court should order JetPay to produce documents, answer interrogatories and supplement its discovery responses. Further, the Court should sanction JetPay pursuant to FRCP 37.

Respectfully submitted,

David Steiner & Associates, PLC

BY: /s/David Paul Steiner
David P. Steiner
California Bar No. 64638
dpsartnetlaw@gmail.com
DAVID STEINER & ASSOCIATES, PLC
1801 Century Park East, Suite 1600
Los Angeles, CA 90067
Telephone: (310) 557-8422
Facsimile: (310) 556-0336
Attorneys for Plaintiff

LEHTOLA & CANNATTI PLLC

BY: /s/Patricia Beaujean Lehtola
Patricia Beaujean Lehtola
State Bar No. 01997700
plehtola@lc-lawfirm.com
Phillip E. Cannatti
State Bar No. 00793456
pcannatti@lc-lawfirm.com
Patrick C. Joost
State Bar No. 24078759
pjoost@lc-lawfirm.com
LEHTOLA & CANNATTI PLLC
5001 Spring Valley Road,
Suite 400 East
Dallas, Texas 75244
(972) 383-1515 (Telephone)
(866) 383-1507 (Facsimile)
Attorneys for Plaintiff

Certificate Conference pursuant to L.R. 7.1(a), (b), (h))

Counsel for Plaintiff Chilly Dil Consulting, Inc. (“Chilly Dil”), David P. Steiner, met and conferred with counsel for Defendant Jetpay ISO Services, LLC (“JetPay”), Lauren Tow and Micah Dortch of Cooper & Scully, numerous times by way of phone conferences and email communications from April 28, 2015, 2015 through May 21, 2015 concerning JetPay’s Response and Objections to Chilly Dil’s First Set of Interrogatories and Documents Requests. By meeting and conferring, Chilly Dil attempted to obtain supplemental responses to these discovery requests from JetPay without this Court’s intervention. (*See* Appendix, Declaration of David P. Steiner, ¶¶ 8-13.) However, despite these efforts, Chilly Dil has not received any further responses or production of documents from JetPay. (*See Id.* at ¶15.)

David Steiner & Associates, PLC

BY: /s/David Paul Steiner
David P. Steiner
California Bar No. 64638
dpsartnetlaw@gmail.com
DAVID STEINER & ASSOCIATES, PLC
1801 Century Park East, Suite 1600
Los Angeles, CA 90067
Telephone: (310) 557-8422
Facsimile: (310) 556-0336
Attorneys for Plaintiff

CERTIFICATE OF SERVICE

This is to certify that on June 17, 2015, the foregoing was served upon counsel of record in accordance with the Federal Rules of Civil Procedure as set forth below by U.S. Mail or electronic filing.

COOPER & SCULLY, P.C.
Timothy Micah Dortch
R. Brent Cooper
Founders Square
900 Jackson Street, Suite 100
Dallas, Texas 75202
Tel.: 214/712-9501
Fax: 214/712-9540
COUNSEL FOR DEFENDANTS

BY: /s/*Patricia Beaujean Lehtola*
Patricia Beaujean Lehtola